Technical Environmental Consultants, Inc. \_

25391

CERTIFIED MAIL

December 13, 1991

Ms. Gerri Scoll, Esq. Cabot Corporation 950 Winter Street P.O. Box 9073 Waltham, MA 02254-9073

Re: Request For Facility Visit For Data Review Fields Brook Superfund Site Administrative Order Pursuant to Section 106 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 as Amended, USEPA Docket No. V-W-89-C-008

Dear Ms. Scoll:

As you have been advised by the USEPA letter dated March 22, 1989, the above Administrative Order was issued to 19 Respondents, including Cabot Corporation, pursuant to Section 106(a) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 ("CERCLA"), 42 U.S.C. 960(a) requiring the Respondents to undertake remedial design (RD) and predesign activities of the Sediment Operable Unit and Source Control remedial investigation/feasibility study (RI/FS) activities for the Fields Brook Site located in Ashtabula County, Ohio (the "Work"). By letter dated March 28, 1989, RMI Company, Gulf + Western, Inc., Occidental Chemical Corporation (successor to Diamond Shamrock Chemical Company and Hooker Electrochemical Company), and Detrex Corporation and later Centerior Energy Corporation (for the Cleveland Electric Illuminating Company) (the "Settling Companies") confirmed their collective intent to immediately commence the Work required by the 106 Order.

Pursuant to Section IX of the 106 Order, this letter is being written to request that Cabot Corporation provide arrangements to meet with the Settling Companies Representatives to review environmental issues that are essential for the Fields Brook Representatives to continue with the Work required by the Statements of Work (SOWs) attached to USEPA's 106 Order.

The objective of this request is to gather any data available that was not included in Phase 0 RI Report that will help in meeting the overall objectives of the Source Control RI/FS effort which are: 1) to identify potential sources of sediment contamination within the Fields Brook drainage area and 2) to evaluate cost-effective remedial alternatives that will minimize recontamination of Fields Brook by these sources. During the Phase 0 investigation, Woodward-Clyde Consultants (WCC), consultant to the Settling Companies, reviewed files available from Ohio EPA and reports submitted by the Fields Brook Settling Companies on the various facilities. Information in these files and reports was summarized in the Phase 0 report and enabled WCC to identify and catalog over 200 potential sources that could contribute to the recontamination of Fields Brook.

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Sincerely,

This information (reviewed files and reports) will be utilized in the preparation of the Phase I Work Plan and Field Sampling Plan. Preliminary Phase I sampling points have been identified. However, our further review indicates that the facilities within the Fields Brook investigation area may have already collected samples for chemical or physical testing at or near the needed sampling points both from the surface and the subsurface. Your cooperation with this request may reduce the Phase I data gathering efforts.

A representative of the Settling Companies will be available to resolve concerns you have on the matter. If you would like to discuss any aspect of this entry and access request, please call the undersigned at (313) 261-0280.

|       | A. Heimbuch<br>t Coordinator  |
|-------|---|
| cc:   | Michael Berman, Office of Regional Counsel, USEPA<br>Edward Hanlon, Remedial Project Manager, USEPA |
| Appro | oval to arrange meeting for data review.  |
| For C | abot Corporation  |
| DATE  | ID:   |